## Federal Deficion RA Document 128 Filed 03/23/22 Page 1 of 2 OF NEW YORK, INC.

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Southern District of New York Jennifer L. Brown Attorney-in-Charge

March 23, 2022

## BY EMAIL & ECF

Honorable Ronnie Abrams United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re:

Cc:

United States v. Anil Mangar,

15 Cr. 655 (RA)

AUSA Frank Balsamello

Application granted. The VOSR is rescheduled for April 29, 2022 at 11:30 a.m.

SO ORDERED.

Ronnie Abrams, U.S.D.J.

March 23, 2022

Dear Judge Abrams:

I write with respect to the VOSR proceedings in the above-captioned case, currently scheduled for tomorrow, March 24, 2022. With the consent of United States Probation and the Government, I respectfully request a 30-day adjournment to allow the parties to continue negotiating a pre-hearing resolution.

Yesterday, the defense received the attached letter from Anil Mangar's local counsel who represents Mr. Mangar on the Bronx County charges overlapping with the pending specifications in the amended supervised-release violation report. Consistent with local counsel's letter, the defense understands that Mr. Mangar pleaded guilty to a violation of NYPL § 215.50(3), seconddegree criminal contempt, an A Misdemeanor, on the understanding that it would be reduced to a violation of NYPL § 240.26, a non-criminal violation, following Mr. Mangar's successful completion of a 26-week-long "Abusive Partner Intervention Program." Mr. Mangar has already completed seven sessions.

In light of Mr. Mangar's resolution of his state case and ongoing participation in a diversion program, the parties have been engaged in productive negotiations about a pre-hearing resolution to the pending VOSR specifications. Because the parties require additional time to see those negotiations through and to propose a resolution for the Court's consideration, the defense requests a 30-day adjournment. There is no objection from United States Probation or the Government.

Respectfully Submitted,

Andrew J. Dalack, Esq.

Assistant Federal Defender

## THE RAMCHARITAR LAW FIRM

## NICHOLAS RAMCHARITAR, ESQ.

SARA SALMERON, ESQ. ASSOCIATE MAXWELL GLASS, ESQ. PARTNER ALEXANDRA GEORGETTI, ESQ. OF COUNSEL

March 22, 2022

Sent via Email to: andrew\_dalack@fd.org
Mr. Andrew Dalack, Esq.
52 Duane Street, 10th Fl.
New York, NY 10007

RE: People v. Anil Mangar Docket No.: CR-013062-21BX

Dear Mr. Dalack:

Please be advised, that this office represents Mr. Mangar in the above-referenced matter.

Please be further advised that Mr. Mangar has authorized our office to share the following information regarding his pending matter. In working diligently to have Mr. Mangar's matter disposed of- he has been offered the following plea:

Program Name: APIP (Abusive Partner Intervention Program)
Welcome to Dignity & Respect

**Program Length: 26 weeks** 

Upon his full completion of the APIP Program, he will be afforded a violation in place of his current misdemeanor(s). It should be noted that Mr. Mangar has completed 7 (seven) sessions to date.

Notably, we were able to successfully have his Felony matters (previously charged) dismissed.

Regards,

Nicholas R. Ramcharitar, Esq. Managing & Founding Partner ramcharitarlawfirm.com/

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